

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Civil Action No. 5:14-cv-00454-FL

LAURA LIEBERMAN

Plaintiff,

V.

ERIC GOINS, in his individual capacity,

TYLER MCNEILL, in his individual

capacity,

ANITRA PEACOCK, in her individual capacity,

DAPHNE SHEPARD, in her individual capacity,

WAYNE COUNTY OFFICE OF EMERGENCY

SERVICES, COUNTY OF WAYNE, North Carolina

&

CITY OF GOLDSBORO, North Carolina

Defendants

and

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
NO: 4:12-CV-226-FL

LINDA A. EVANS

Plaintiff,

v.

PITT COUNTY DEPARTMENT OF

SOCIAL SERVICES, GEORGE L.

PERRY, Director of Pitt County Social

Services in his official capacity; LINDA

MARTIN CURTIS, in her individual

capacity; LINDA H. MILLION, in her

individual capacity; CYNTHIA M, ROSS

in her individual capacity; and APRIL

HANNING, in her individual capacity,

Defendants.

and

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
NORTHERN DIVISION
CIVIL ACTION NO: 2:14-cv-00036-D

JONATHAN E. DAVENPORT,
Plaintiff,

v.

PASQUOTANK COUNTY SHERIFF'S DEPUTY SAM KEITH,
PASQUOTANK COUNTY SHERIFF RANDY
CARTWRIGHT, BILLY ROUGHTON, NORMAN W.
SHEARIN, JR., (FORMER) ASSISTANT DISTRICT ATTORNEY
(FIRST JUDICIAL DISTRICT) DAVID L. CREDLE,
(FORMER) ASSISTANT DISTRICT ATTORNEY (FIRST JUDICIAL DISTRICT)
NANCY B. LAMB, PASQUOTANK COUNTY ATTORNEY
RICHARD MICHAEL COX, DISTRICT ATTORNEY OFFICE (FIRST JUDICIAL DISTRICT),
PASQUOTANK COUNTY SHERIFF'S OFFICE, DBW VENTURES (a partnership),
SPECIAL AGENT/UNITED STATES DEPARTMENT OF
TREASURY RODNEY T. DICKERSON, ASSISTANT
UNITED STATES ATTORNEY J. GASTON B. WILLIAMS
& DISTRICT ATTORNEY (FIRST JUDICIAL DISTRICT)
ROBERT ANDREW WOMBLE
Defendants.

and

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION NO. 5:13-CV-00075-FL

JACKIE LEE CHESTER,
Plaintiff

v.

ADAMS AUTO WASH
Defendant

Response to Order to Show Cause/Notice

David C. Sutton, attorney for the Plaintiff in the three aforementioned cases and the attorney for the defendant in the latter case received a notice to show cause as to why his right to practice in federal court should not be suspended due to the N.C. State Bar's Order (entered on 11/13/14) that suspended the

undersigned's license to practice law for 5 years. That suspension was to go into effect on December 13, 2014. The NC Court of Appeals entered a stay of the suspension order on Friday the 12th of December, 2014 (at approximately 4:00pm). The stay is effective until the Court of Appeals fully considers the undersigned's petition for writ of supersedeas. The undersigned filed Notice of Appeal of the suspension order on December 10th, 2014. Thus, the Notice of Appeal was timely filed. Currently, the undersigned is not subject to any order that places any limitation on his right to practice law. One of the bases for the stay was that the Bar had not considered the First Amendment because as an administrative body it lacks the authority to rule upon constitutional issues and it should not be able to suspend the undersigned's law license before constitutional issues are adjudicated. It is the undersigned's position that the Bar punished him for protected speech and that he is likely to prevail on appeal. The undersigned did not anticipate the last minute "reprieve," has no staff and was making arrangements to shut down his practice. Please accept my sincere apologies for any delays or inconvenience cause by my situation with the N.C. Bar.

WHEREFORE, the undersigned respectfully requests that the Court accept this as response to any show cause order and/or accept this as notice that the undersigned is fully licensed to practice law in this state and in Florida as well.

Respectfully submitted this the 14th day of December, 2014.

/s/David C. Sutton
David C. Sutton
Attorney for Defendant
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